

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HORNBECK OFFSHORE SERVICES, LLC,

Plaintiff,

v.

NICHOLS BROTHERS BOAT BUILDERS,
INC., et al.,

Defendants.

No. C06-782JLR

**DECLARATION OF
KELLY P. CORR**

I, Kelly P. Corr, declare as follows:

1. I am an attorney licensed to practice law in this state and in this Court.

2. I was out-of-state with my wife and two children on vacation from Saturday, February 16, 2008 through Monday, February 25, 2008. During that time I spoke on the phone at least twice with Matt Nichols, and at least twice with J. Robert Leach.

3. I attended a settlement conference with J. Robert Leach, plaintiff's counsel and others on Tuesday, February 26, 2008. This was the first time I met Mr. Leach and it was my first substantive meeting regarding this case.

1 4. Later that same day I talked to both Matt and Bryan Nichols to discuss the
2 terms of our firm's engagement. Those details have not been finalized yet, but I am optimistic
3 we will reach a satisfactory arrangement very shortly.

4 5. I told Messrs. Nichols that I would represent them and Langley Properties if
5 we could reach a mutually satisfactory financial agreement and if we could obtain a
6 continuance of the trial date.

7 6. I need the continuance to familiarize myself with the file and to re-arrange
8 some of my schedule to devote the time necessary to get ready for trial.

9 7. I currently have a number of other cases occupying my time, including three
10 class actions, a brain damaged child case, two sexual molestation cases and a variety of other
11 matters. One of the class actions has been certified already; the discovery cutoff is May 5,
12 2008, and the trial date is June 2, 2008. We recently made a motion to continue these two
13 dates; plaintiff's counsel has stated they will oppose our motion.

14 8. I will be on a previously scheduled vacation with my family from April 5 - 13,
15 2008. This is my children's "spring break" from school.

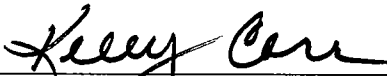
16 9. Taking over this case involves a number of unusual challenges. Aside from
17 the very short time to the current trial date of April 29, 2008, my soon-to-be predecessor
18 counsel, J. Robert Leach, will not be available to help me after Friday, February 29, 2008
19 because he has been appointed to the bench. It is also my understanding that neither he nor
20 his firm has the complete file of this case and that about 14,000 documents have been
21 exchanged in this case. On February 27, 2008, I called Garvey Schubert and asked for access
22 to this file. The same day, I followed up that oral request with the attached e-mail request but
23 I have not heard back from Garvey Schubert yet. In addition, it appears my clients would be
24

1 the only defendants left in the case and I cannot rely on co-counsel for any other defendant to
2 take the lead or divide the work.

3 10. A continuance of approximately three (3) additional months, until late July or
4 early August 2008, is requested.

5 I declare under penalty of perjury under the laws of the State of Washington that
6 the foregoing is true and correct to the best of my belief.

7 DATED this 28th day of February, 2008, at Seattle, Washington.

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11 Kelly P. Corr
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CERTIFICATE OF SERVICE

The undersigned declares as follows:

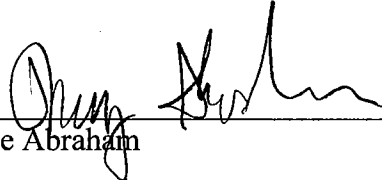
I am employed at Corr Cronin Michelson Baumgardner & Preece LLP.

I hereby certify that on February 28, 2008, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following person:

Timothy Leyh
Danielson Harrigan Leyh & Tollefson
999 3rd Ave., Suite 4400
Seattle, WA 98104

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 28th day of February, 2008, at Seattle, Washington.



Joyce Abraham

EXHIBIT A

Corr, Kelly

From: Corr, Kelly
Sent: Wednesday, February 27, 2008 9:14 AM
To: 'gstrauss@gsblaw.com'
Cc: 'J Leach'
Subject: Hornbeck case

Gary, moments ago I left you a short vm msg. It appears that we will be taking over the defense of this case from J. Leach. J advises that he does not have a complete set of the depositions and deposition exhibits in this case but that your firm does. Could we get copies of those as soon as possible please? Thank you, Kelly.

Kelly Corr
Corr Cronin Michelson
Baumgardner & Preece LLP
1001 4th Ave., Suite 3900
Seattle, WA 98154-1051

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